

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,

Plaintiff,

HON. Laurie J. Michelson  
Case No. 4:19-cr-20798

vs.

RAJON JAMISON,

Defendant.

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U.S. Department of Justice  
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DEFENDANT RAJON JAMISON'S EMERGENCY MOTION TO ATTEND  
FAMILY FUNERAL

Defendant, RAJON JAMISON, (“Defendant”), by and through his attorneys, STEFANIE LAMBERT JUNTILA, and SANFORD SCHULMAN, move this Honorable Court to allow Defendant Jamison to attend the funeral of his fiancé’s father, John David Potter, on Saturday, August 7, 2021, for the following reasons:

1. Defendant, Rajon Jamison, was charged with Possession of Firearms by a Prohibited Person in violation of 18 U.S.C. §§922(g)(1) and 924(e).
2. Defendant, Rajon Jamison, consented to detention on December 20, 2019.
3. Defendant, Rajon Jamison, is engaged to be married to Jasmine Major, and they have a two-year-old child in common, Heavenly Mae Major.
4. Heavenly Mae Major was born prematurely and had and continues to have medical complications as a result of atrial septal defect.
5. Jasmine Major is the daughter of John David Potter, and her family will attend his funeral on Saturday, August 7, 2021. (Exhibit 1).
6. Jasmine Major would like the emotional support of her fiancé while she grieves the loss of her father as well as Mr. Jamison’s support and help to care for their daughter during this difficult time.
7. The Celebration of Life will take place at the Lee Chapel Saturday, August 7, 2021, at 4pm and Mr. Potter in Norton Shores, Michigan.
8. Defendant, Rajon Jamison, respectfully requests to be released on August 6, 2021, through August 13, 2021, on GSP tether to attend the Celebration of Life for Mr. Potter, and support his fiancé and daughter through this difficult time.

9. Defendant sought concurrence in compliance with local court rules, and the U.S. Department of Justice declines to consent to Rajon Jamison's temporary release.

WHEREFORE, Defendant respectfully requests that this Court enter an Order allowing Defendant to be released on GPS tether from August 6, 2021, to August 13, 2021.

Respectfully submitted,

/s/STEFANIE LAMBERT JUNTILA

Stefanie Lambert Junttila, P71303

RAJON JAMISON

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Detroit, MI 48226

(313) 963-4740

Date: August 6, 2021

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BRIEF IN SUPPORT OF RAJON JAMISON'S EMERGENCY MOTION TO  
ATTEND FAMILY FUNERAL

Defendant, RAJON JAMISON, (“Defendant”), by and through his attorneys, STEFANIE LAMBERT JUNTILA, and SANFORD SCHULMAN, move this Honorable Court to allow Defendant Jamison to attend the funeral of his fiancé’s father, John David Potter, on Saturday, August 7, 2021, for the following reasons:

Defendant is charged with Possession of Firearms by a Prohibited Person in violation of 18 U.S.C. §§922(g)(1) and 924(e). and is currently held at the Clare County Jail in Harrison, Michigan.

Defendant is engaged to be married to Jasmine Minor, and has a child in common, Heavenly Mae Minor. Heavenly Minor was born prematurely and continues to have medical needs as a result of a heart defect.

Defendant’s fiancé’s father, John Potter, recently passed away, and his Celebration of Life will be held on Saturday, August 7, 2021, at 4 p.m. in Norton Shores, Michigan. Ms. Minor has been caring for their daughter, Heavenly Mae, while she is grieving the loss of her father. Defendant Jamison would like to support her emotionally, as well as care for two-year-old Heavenly Mae during this difficult time for their family.

Defendant would like to attend the Celebration of Life of Mr. Potter with his fiancé and daughter and provide support to his family during this difficult time.

WHEREFORE, Defendant respectfully requests that this Court release him on a GPS tether from August 6, 2021, to August 13, 2021, to attend his fiancé’s

father's funeral with his family.

Respectfully submitted,

/s/STEFANIE LAMBERT JUNTILA  
Stefanie Lambert Junttila, P71303  
RAJON JAMISON  
500 Griswold Street, Ste. 2340  
Detroit, MI 48226  
(313) 963-4740

Date: August 6, 2021

CERTIFICATE OF SERVICE

I hereby certify that on August 6, 2021, I electronically filed the foregoing document with the Clerk of the Court using the ECF system, which will send notification of such filing to Assistant United States Attorney Ann Nee.

/s/STEFANIE LAMBERT JUNTILA  
Stefanie Lambert Junttila, P71303  
RAJON JAMISON  
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Date: August 6, 2021